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Attorneys for Defendants

TRULITE GLASS & ALUMINUM SOLUTIONS, LLC,
HERBERT CORTEZ, SHAUN HANNA, AND STEVE
WILLIAMS

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LEE KIRK,

Plaintiff,

VS.

TRULITE GLASS & ALUMINUM
SOLUTIONS, LLC, a Foreign Limited
Liability Company, HERBERT CORTEZ,
an Individual, STEVE WILLIAMS, an
Individual, SHAUN HANNA, an
Individual, DOES I-X; ROE
CORPORATIONS I-X,

Defendants.

Case No. 2:18-CV-00043-JCM-GWF

**STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME FOR DEFENDANT
STEVE WILLIAMS TO RESPOND TO
PLAINTIFF'S COMPLAINT**

[FIRST REQUEST]

Plaintiff LEE KIRK and Defendant STEVE WILLIAMS (“Williams”), by and through their undersigned counsel, hereby agree and stipulate to extend the time for Williams to file his response to Plaintiff’s Complaint from its current deadline of **February 22, 2018** up to and including **March 6, 2018**.

Insofar as Defendants' counsel was only recently retained to represent Williams in this matter, this extension is being requested in order to give Williams necessary additional time to look into Plaintiff's allegations against him and conduct the required diligence necessary to prepare and

1 file Williams's response to the Complaint. The requested March 6, 2018 response deadline is also
2 presently the deadline set for the other Defendants in the case to respond to the Complaint.

3 This is the first request for an extension of time to respond to the Complaint made by
4 Williams. This request is made in good faith and not for the purpose of delay.

5 Dated: February 15, 2018

Dated: February 15, 2018

6 Respectfully submitted,

7 Respectfully submitted,

8 /s/ Jenny L. Foley
9 JENNY L. FOLEY, PH.D, ESQ.
10 HKM EMPLOYMENT ATTORNEYS
LLP

11 Attorneys for Plaintiff
12 LEE KIRK

8 /s/ Montgomery Y. Paek
9 MONTGOMERY Y. PAAK, ESQ.
10 TIMOTHY W. ROEHR, ESQ.
LITTLER MENDELSON, P.C.

11 Attorneys for Defendant
12 TRULITE GLASS & ALUMINUM
13 SOLUTIONS, LLC, HERBERT CORTEZ,
14 SHAUN HANNA, and STEVE WILLIAMS

15 **ORDER**

16 **IT IS SO ORDERED.**

17 Dated: February 20, 2018.

18 
19 UNITED STATES MAGISTRATE JUDGE

20 Firmwide:152692339.1 072120.1013